1	Jennifer E. Hoekel (NV Bar No. 12775)		
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4	St. Louis, MO 63105 314-480-1500 Telephone		
5	Counsel for Defendant U-Haul International,		
6	Inc.		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	PATENT ARMORY INC.,		
10	Plaintiff,	Case No.: 2:23-cv-01921-CDS-DJA	
11	V.	UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO	
12	U-HAUL INTERNATIONAL, INC.,	RESPOND TO COMPLAINT	
13	Defendant.		
14	Defendant U-Haul International, Inc. ("U-Haul" or "Defendant"), hereby submits this		
15	unopposed motion for an extension of time of an additional forty-five (45) days, up to and		
16	including January 4, 2024, for Defendant to answer, move or otherwise respond to the complaint		
17	in this action. In support of its motion, Defendant states as follows:		
18	1. On November 20, 2023, this action was transferred from the United States District		
19	Court for the Western District of Texas.		
20	2. While the action was pending the United States District Court for the Western		
21	District of Texas, the parties twice jointly agreed to extend the deadline for Defendant's deadline		
22	to answer or otherwise respond to the Complaint in order facilitate investigation of the		
23	complaint's factual allegations and to give the parties time to discuss settlement.		
24	3. The parties have discussed this issue and agree that Defendant should be		
25	permitted an additional forty-five (45) days, up to and including January 4, 2024 to answer,		
26	move or otherwise respond to the complaint in this action. Accordingly, Plaintiff Patent Armory,		
27	Inc. does not oppose this motion.		

- 4. This extension is appropriate and will promote judicial economy because the parties have been and intend to continue to engage in negotiations regarding an amicable resolution to the dispute.
- 5. The requested extension will not disrupt the schedule in this case—no scheduling order has been entered— or prejudice any party.
- 6. This is the third extension of time for Defendant to file its answer, move, or otherwise respond to the complaint in this action.
- 7. This request is being submitted, with Plaintiff's consent, two days after the expiration of the prior deadline to respond to the complaint as a result of complications due to transfer of the case from the Western District of Texas and to promote amicable resolution of the dispute.

For all the foregoing reasons, Defendant requests that the Court grant its unopposed motion and extend the deadline for Defendant to answer, move, or otherwise respond to the complaint in this action up to and including January 4, 2024.

IT IS SO ORDERED

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: 11/27/2023

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1	Date: November 22, 2023	
2		Respectfully submitted,
3		By: <u>/s/ Jennifer E. Hoekel</u>
4		Jennifer E. Hoekel (NV Bar No. 12775) jennifer.hoekel@huschblackwell.com
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## **CERTIFICATE OF SERVICE** I hereby certify that on this 22<sup>nd</sup> day of November, 2023, I caused the foregoing to be filed electronically with the Clerk of Court and to be served via the Court's Electronic Filing System upon all counsel of record. /s/ Jennifer E. Hoekel